

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**VIDAL MCDOWELL, on behalf of  
himself and on behalf of all  
others similarly situated,**

**Plaintiff,**

v.

**Case No: 2:23-cv-12827-RJW-APP**

**PLUTO ACQUISITION OPCO, LLC  
d/b/a PEOPLEFACTS, LLC**

**Defendant.**

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**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS  
SETTLEMENT AND NOTICE TO SETTLEMENT CLASS**

For the reasons set forth in the Memorandum, Plaintiff, Vidal McDowell, and Defendant, Pluto Acquisition Opco, LLC d/b/a PeopleFacts, LLC, respectfully ask the Court to certify, for settlement purposes only, the Settlement Classes, grant preliminary approval of the Settlement, and to order Notice be sent to the K-Notice Payment Class. The Settled Parties request any additional relief the Court deems warranted under the circumstances.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 16, 2025, a true and correct copy of the foregoing was electronically filed with the Court's CM/ECF system which will electronically serve all parties of record.

/s/ Marc R. Edelman  
**MARC R. EDELMAN, ESQ.**